



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

MKP
F. #2017R01840

*271 Cadman Plaza East
Brooklyn, New York 11201*

May 9, 2018

By ECF

The Honorable Nicholas G. Garaufis
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Keith Raniere, et al.
Criminal Docket No. 18-204 (NGG)

Dear Judge Garaufis:

The government respectfully submits this letter to update the Court as to the parties' progress in reaching an agreed-upon proposed protective order to govern the production of certain discovery materials in the above-captioned matter. At last Friday's status conference, the government represented that it would provide a draft proposed order to defense counsel on Tuesday, which it did. Defendants have raised certain objections to the scope of the government's proposed order, and the parties are continuing to work in good faith to reach a mutually agreed-upon proposed order. The parties jointly request that the Court allow the parties until close of business this Friday, May 11, 2018, to continue discussions. By that time the parties will submit an agreed-upon proposed order or the

government will move for entry of its proposed order and will be available for a conference early next week if the Court wishes to hear from the parties.

Respectfully submitted,

RICHARD P. DONOGHUE
United States Attorney

By: /s/ Moira Kim Penza
Moira Kim Penza
Tanya Hajjar
Assistant U.S. Attorneys
(718) 254-7000

cc: Clerk of the Court (NGG) (by ECF)
Defense Counsel (by ECF and email)